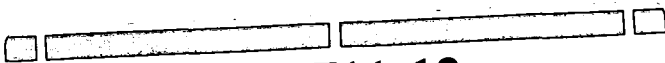


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— G-000-711.12 —

**MONTHLY PROGRESS REPORT FOR PERIOD
ENDING DECEMBER, 31, 1987**

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**10
ENCLOSURE**

MONTHLY PROGRESS REPORT FOR PERIOD ENDING DECEMBER 31, 1987

SUMMARY

Actions associated with the Federal Facilities Compliance Agreement (FFCA) have continued during the month of December, 1987. Highlights of work completed this month, and a separate listing of ongoing actions are shown below.

The FMPC completed installation of nine (9) additional groundwater monitoring wells in support of the Remedial Investigation/Feasibility Study (RI/FS) during the month of December. A meeting was held at US EPA-Region V in Chicago, Illinois to discuss EPA comments on Revision 1 of the RI/FS Work Plan.

Volume 3 of the Characterization Investigation Study (CIS) final report was received during December 1987. Volume 3 provides results for the Surface Radiological Investigation of the FMPC Waste Storage Area. The report is undergoing final review prior to issuance.

The fourth monthly RI/FS technical progress report was transmitted to the US EPA on December 20, 1987.

INTRODUCTION

As an integral part of the agreement between the U. S. Department of Energy (US DOE) and the US EPA signed on July 18, 1986, monthly reports are provided by US DOE to US EPA regarding the progress made to meet the provisions of that agreement. This report fulfills that requirement by describing actions undertaken at the Feed Materials Production Center (FMPC) during the period of December 1 through December 31, 1987.

WORK ASSIGNMENTS AND PROGRESS

The status of ongoing and completed work in support of the FFCA is summarized in Table 1. Additional descriptions of the work being performed and progress on these tasks are shown in the following sections. In both this portion of the monthly report, and in Table 1 (attached) descriptions of assignments are presented in a format similar to that of the FFCA.

- ° Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)

1. Interim Remedial Measures

Work on these sections is complete.

Section 1.C

Phase I of K-65 interim remedial action has been completed. Implementation of Phase II will begin in spring, 1988 and be completed by June, 1988.

2. Remedial Investigation/Feasibility Study (RI/FS)

Section 2.A to 2.D

Work on these sections is complete.

Section 2.E

On December 10 and 11, 1987, WMCO and DOE personnel met with US EPA and Ohio EPA personnel in Chicago, Illinois. The purpose of the meeting was to address the second round of EPA comments on the FMPC RI/FS Work Plan and to focus on issues where the regulatory agencies and FMPC still disagree.

Of a total of eighty-eight comments, sixteen required additional discussions to resolve differences. At the conclusion of the meeting, FMPC and regulatory personnel had reached tentative agreement on all but three issues.

Of these three items, two were subsequently discussed in a second meeting with US EPA on December 21, 1987. Tentative agreements were reached regarding the methods by which these two concerns may be resolved. A third item regarding the testing of purge water, remains open.

Section 2.F

On July 21, 1987, the FMPC received written approval from the US EPA to proceed with the installation of forty-five groundwater monitoring wells. Installation of the monitoring wells was initiated on August 25, 1987.

By the end of December, the FMPC had completed the installation of thirty-five (35) groundwater monitoring wells. Nine new wells (111, 181, 182, 178, 367, 343, 243, 127 and 227) were completed during the reporting period. In December, 715 lineal feet of drilling was completed.

Wells are currently being installed at locations 364, 125, and 183. Samples were collected from cuttings from the newly installed wells, and tested for concentrations of organics and radionuclides. The concentrations of organics and radionuclides in the field tested samples were not above background (as determined by field screening instruments).

Radiological walkover surveys were continued on grids located north of the production area within the security buffer zone. Some isolated areas north of the production area were found to exhibit above background direct radiation levels as determined by both the FIDLER probes and large volume scintillation detectors (SPA-3).

Volume 3 of the Characterization Investigation Study (CIS) was received during December, 1987. Volume 3 presents the results of the comprehensive surface radiological survey of the FMPC waste storage area. The report is undergoing final review prior to issuance.

Section 2.G to 2.L

Work has not yet begun on these items.

3 Reports and Record Keeping

Section 3.B

The fourth RI/FS monthly technical progress report was transmitted to U.S. EPA on December 20, 1987. The fifth monthly technical progress report will be transmitted during the month of January.

° Clean Air Act (CAA)

Section B - Items 1 through 4

The FMPC deliverable addressing Section B - Items 1 through 4 of the Clean Air Act Section of the FFCA was transmitted to U.S. EPA in August 1986.

A May 12, 1987 letter from William D. Franz to James A. Reafsnider stated that the FMPC air monitoring network should be reevaluated for its ability to measure representative concentrations of air pollutants. An evaluation of the FMPC air monitoring network was performed in December, 1986. Mr. Franz's concerns on the location of air monitoring station No. 6 were addressed during the joint OEPA/US EPA inspection on July 14-17, 1987. Actions are currently underway to modify existing monitoring stations to meet EPA siting criteria. Modifications of the monitoring stations will be completed by April 1, 1988.

The annual progress report for 1987 replacement of control devices is currently undergoing internal review. This report will be submitted to EPA during January, 1988.

Section D.1 & D.2

The yearly particulate stack testing schedule for FY-88 was transmitted to EPA December 15, 1987. The results of the FY-87 stack tests are complete. The results of nine (9) stack test emission reports (including particulate and radiological results)

were reported to EPA December 22, 1987. Radiological analysis results will be provided in the next quarterly report.

Section E.2

The fourth Quarterly Particulate Emission Report covering the period from July through September of 1987 was transmitted by DOE to EPA on October 23, 1987.

Sections F and G

Work on these sections is complete.

° Resource Conservation and Recovery Act (RCRA)

Sections A and B - Items A.1 through A.7 and Items B.1 through B.5

US EPA - Region V provided comments on Sections A and B in December 1986. Both Sections were revised to reflect US EPA comments. The revised Section A was transmitted to the US EPA on January 23, 1987. The revised Section B was transmitted to the US EPA on January 28 1987..

A May 12, 1987 letter from William D. Franz to James A. Reafsnyder provided a second round of US EPA comments on these revised FFCA deliverables. The FMPC response to these comments will be forwarded to US EPA in January.

Section C.1

Work on this item is complete.

° Radiation Discharge Information

Section A with Items A.1, A.2, and A.3

The FMPC off-site environmental monitoring program and the associated quality assurance plan were provided to US EPA in August 1986. A May 12, 1987 letter from William D. Franz to James A. Reafsnyder provided US EPA comments on these documents.

Three Quarterly Liquid Discharge Reports have been transmitted to EPA thus far. The fourth Quarterly Liquid Discharge Report for the period from July through September, 1987 was transmitted to US EPA on October 23, 1987 with the fourth Quarterly FFCA report.

TABLE 1.

STATUS OF ASSIGNMENTS FOR WORK REQUIRED ON
FEDERAL FACILITIES COMPLIANCE AGREEMENT ACTIONS

STATUS OF ACTIONS AS OF
31-Dec-87

ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
CERCLA ACTIONS			
1	INTERIM REMEDIAL MEASURES		
1.A	Develop and implement O&M procedures and work practices to control radioactive emissions, including radon gas and decay products.	60 days	Complete. Comments were received from U.S. EPA on June 2, 1987. A comment response was transmitted to U.S. EPA on 10-Jul-87. SOPs in process of being revised.
1.B.	Develop and provide to EPA a plan and implementation schedule for the control of radon at the K-65 silos.	30 days	Revised deliverable was transmitted to EPA on 23-Jan-87. Second set of comments on original 17-Aug-86 submittal received 17-Jun-87. A comment response was transmitted to U.S. EPA on 10-Jul-87.
1.C.	Implement radon control plan approved by the EPA.	----	Phase I of K-65 interim remedial action is complete. Phase II to begin in Spring 1988.
2	REMEDIAL INVESTIGATION/FEASIBILITY STUDY		
2.A.	RI/FS work to be conducted in accordance with EPA guidelines.	NA	No Action Required.
2.B.	-- No Action Required --	----	
2.C.	Provide to EPA analysis results for laboratory certification ---- SOW Task 7b.	45 days	Completed.
2.D.	Submit to EPA Work Plan for a complete sitewide RI/FS.	90 days	Work plan transmitted 19-Dec-86. Supporting documents were transmitted on 30-Jan-87.
2.E	Amend and submit revised RI/FS work plan to EPA if deficiencies are found.		Draft comments received from U.S. EPA on 14-May-87. Final comments issued from U.S. EPA 24-Jun-87. Comment responses and a revised Work Plan were transmitted to EPA on 24-Aug-87.

A meeting was held December 10, 1987 at US EPA-Region V in Chicago, Ill to discuss draft EPA comments on the Work Plan Rev. 1. Significant progress was realized at this meeting toward resolving the outstanding technical

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			issues associated with the RI/FS Work Plan. Final US EPA comments on the Work Plan Revision 1 were received at the FMPC on December 28, 1987. A response is in preparation.
2.F	Implement tasks detailed in the approved RI/FS Work Plan.		A conditional approval to initiate drilling 45 RI/FS monitoring wells was received from US EPA. Drilling of the wells was initiated on 25-Aug-87. A total of 35 groundwater monitoring wells were completed by 31-DEC-87. A request to initiate additional RI/FS tasks was transmitted to USEPA on 22-Oct-87 via letter #DOE 63-88.
3	REPORTS AND RECORD KEEPING		
3.B	RI/FS Progress Report		The fourth RI/FS progress report was transmitted to US EPA on 20-Dec-87.
CLEAN AIR ACT			
A.	-- No Action Required --	----	
B.1.	Install real-time alarm monitors on all MAJOR emission points. Also list non-alarmed emission points.	30 days	Completed.
B.2.	Establish and implement administrative controls for real-time monitors to ensure any unplanned releases will be detected and dealt with in 24 hours.	30 days	Completed.
B.3.	Establish and implement sample collection and analysis procedures and a QA plan to monitor ALL radionuclide emission points.	30 days	Completed.

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STATUS OF ACTIONS AS OF 31-Dec-87			
ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
B.4.	Establish schedule for the installation and replacement of emission control devices.	30 days	Completed.
	Prepare annual progress report on installation and replacement of emission control devices.	annually	The first annual progress report is undergoing internal review. This report will be sent to EPA during Jan-88.
	Respond to U.S. EPA comments on Air Monitoring Network WDF-JAR dated 12-May-87.		In progress. WDF concerns on monitoring station no. 6 addressed in July 14-17, 1987 meeting at the FMPC. Actions to address WDF concerns on FMPC monitoring stations meeting EPA siting criteria to be implemented by 1-Apr-88
C.	-- No Action Required --	----	
D.1	Provide EPA yearly stack-testing schedule.	yearly	Completed. The first annual stack testing schedule was transmitted to EPA in December, 1986. The FY-88 schedule was transmitted on 31-Dec-87.
D.2	Provide EPA stack-test results for stacks tested that year.	45 days after test analyses completed	Final stack tests were completed in September. 87. Stack test results for 9 stacks. (including particulate radiological results) were reported to EPA December 22, 1987. Radiological analysis results will again be provided in the next Quarterly Report.
E.1	Maintain records of monthly particulate matter emissions.	----	Continuing.
E.2	Provide quarterly reports to EPA on these emissions.	quarterly	The initial report was transmitted on 12-Dec-86. The second report was issued 20-Apr-87. The third report was issued 29-Jul-87. The fourth report was issued 19-Oct-87.
F.	Provide EPA list of environmental air monitoring equipment, including	60 days	Completed.

TABLE 1.

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STATUS OF ACTIONS AS OF 31-Dec-87			
ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
	location and the O&M program.		
G.	Develop and provide EPA an O&M program for air pollution control devices.	90 days	Completed.
RCRA			
A.	Achieve compliance with interim status regulations.	30 days	Revisions to the A1-A7 submittals transmitted on January 23, 1987. Additional comments received on 12-May-87. Response to be transmitted to US EPA following completion of internal review.
A.1.	Conduct hazardous waste determination on all waste streams.	30 days	Completed.
A.2.	Commence a hazardous waste analysis program.	30 days	Completed.
A.3.	Update of operating records pursuant to 40 CFR 265.73 and 265.309.	30 days	Completed.
A.4.	Include full name and signature and date received on manifests pursuant to 40 CFR 265.71.	30 days	Completed.
A.5.	Update the facility closure plan to reflect the year the facility expects to begin closure.	30 days	Completed.
A.6.	Begin collection of all run-off from the active portions of pit 4.	30 days	Completed.
A.7.	Prepare and maintain outline for a groundwater quality assessment program.	30 days	Completed.
B.	Submit to EPA for approval a detailed groundwater monitoring plan.	90 days	Complete. Additional comments received from US EPA on 12-May-87. Response to be transmitted to U.S. EPA following completion of internal review.
B.1.	Determine groundwater flow at the RCRA regulated units.	90 days	Completed.

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STATUS OF ACTIONS AS OF 31-Dec-87			
ACTION	DESCRIPTION	COMPLETION TIME AFTER FFCA SIGNED	STATUS
B.2.	Provide map showing location of all RCRA monitoring wells.	90 days	Completed.
B.3.	Include design and construction specs for all RCRA wells.	90 days	Completed.
B.4.	Monitor for all Appendix VIII constituents, including radionuclides.	90 days	Completed.
B.5.	Include a sampling and analysis plan to meet 40 CFR 265.92.	90 days	Completed
C.1.	Develop a closure plan for the landfill pursuant to 40 CFR 265.112.	60 days	Final closure plan was transmitted to US EPA on July 29, 1987.
C.2.	Develop a post-closure plan for the landfill pursuant to 40 CFR 265.118.	60 days	To be developed following RI/FS.
RADIATION DISCHARGE INFORMATION			
A.	Respond to USEPA comments on Items A.1. - A.3. WDF-JAR dated 12-May-87.		In process.
A.1	Provide EPA with existing offsite environmental monitoring program.	30 days	Completed.
A.2	Provide EPA the QA program associated with the environmental monitoring program.	30 days	Completed.
A.3	Report to U.S. EPA, OEPA and Ohio Department of Health the results of the continuous liquid discharge samples.	quarterly	Initial report transmitted on December 12, 1986. Second report transmitted April 20, 1987. Third report transmitted July 29, 1987. Fourth report was transmitted in November.
REPORTING REQUIREMENTS			
B	Issue monthly progress report of actions taken to ensure compliance with FFCA requirements.	30 days	Aug. 86 issued to US EPA Sep. 86. Sep. 86 issued to US EPA Oct. 86. Oct. 86 issued to US EPA Nov. 86. Nov. 86 issued to US EPA Dec. 86.

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31-Dec-87

ACTION	DESCRIPTION	COMPLETION	STATUS
		TIME AFTER FFCA SIGNED	
			Dec. 86 issued to US EPA Jan. 87.
			Jan. 87 issued to US EPA Feb. 87.
			Feb. 87 issued to US EPA Mar. 87.
			Mar. 87 issued to US EPA Apr. 87.
			Apr. 87 issued to US EPA May 87.
			May 87 issued to US EPA Jun. 87.
			Jun. 87 issued to US EPA Jul. 87.
			Jul. 87 issued to US EPA Aug. 87.
			Aug. 87 issued to US EPA Sep. 87.
			Sep. 87 issued to US EPA Oct. 87.
			Oct. 87 issued to US EPA Nov. 87.
			Nov. 87 issued to US EPA Dec. 87.